

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

FILED

In re: Trikeenan Tile works, et al.

Chapter 11

2011 JAN 28 A 9:06

Case Nos. 10-13725,26, 27 JMD  
(jointly administered)

CLERK  
BANKRUPTCY COURT  
DISTRICT OF NH

**REPLY TO DEBTOR'S RESPONSE TO OBJECTION OF CAPSTAN, INC. TO MOTION  
FOR CONTINUED AUTHORITY TO USE CASH COLLATERAL**

NOW COMES, Robert Sarvis, assignee of the agreement between Capstan, Inc and Trikeenan, Inc. and states:

- 1) A UCC statement securing Capstan, Inc.'s position on Trikeenan, Inc. inventory was filed in the State of New Hampshire in September 2007. Therefore, there is a perfected interest in the inventory of the Debtor pursuant to 11 USC 552(b).
- 2) Based on the representations of TD Bank there appears to be value remaining over their claims (See Objection to Use of Cash Collateral of TD Bank).
- 3) The Objection is late only because of Trikeenan's breach of its duty to notify Capstan, Inc. or Robert Sarvis of its filing Chapter 11.

Robert Sarvis respectfully asks the Court to consider these facts when making its decisions.

DATED 1/22/2011

Respectfully submitted,

  
Robert H. Sarvis  
11 Vesper Lane  
Nantucket, MA 02554

Certificate of Service: The above was served on the Debtor and US Trustee via first class mail on the date above. .

Robert Sarvis